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5 BEFORE THE INSURANCE COMMISSIONER
6 OF THE STATE OF WASHINGTON

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8 In the Matter of the Application regarding the
9 Conversion and Acquisition of Control of
10 Premera Blue Cross and its Affiliates

OIC Docket No. G02-45

WSMA'S OBJECTIONS TO PREMERA'S
AMENDED FIRST SET OF DOCUMENT
REQUESTS

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12 On October 21, 2003 Premera served its Amended First Set of Document Requests upon
13 the Washington State Medical Association ("WSMA"). The WSMA submits the following
14 responses and objections:

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16 REQUEST FOR PRODUCTION NO. 1:

17 The WSMA objects to this request because it purports to require the WSMA to produce
18 documents that are covered by the attorney-client privilege and work product doctrine. The
19 request also seeks irrelevant material not reasonably calculated to lead to the discovery of
admissible evidence, and is unduly burdensome.

20 Subject to and without any waiver of any of its general objections, the WSMA will produce a
21 current resume or *curriculum vitae* of anyone it intends to call as an expert witness at the
22 Conversion Hearing.
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1 REQUEST FOR PRODUCTION NO. 2:

2 The WSMA has no such documents in its possession, custody, or control.

3 REQUEST FOR PRODUCTION NO. 3:

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5 The WSMA objects to this request because it purports to require the WSMA to produce
6 documents that are covered by the work product doctrine and other applicable privilege or
7 protection.

8 Subject to and without any waiver of any of its general objections, the WSMA will produce a
9 current resume of anyone it intends to call as a non-expert witness at the Conversion Hearing,
10 and will produce for inspection and copying the documents they expect to use to the extent it is
11 known to them on the date of production.

12 REQUEST FOR PRODUCTION NO. 4:

13 The WSMA objects to this request because it purports to require the WSMA to produce
14 documents that are covered by the attorney-client privilege, the work product doctrine, and other
15 applicable privilege or protection.

16 The request is also overly broad and unduly burdensome.

17 Subject to and without any waiver of any of its general objections, the WSMA will produce for
18 inspection and copying communications it has sent to its members, and its members have sent
19 the Association, regarding the Conversion Hearing or Conversion Forums, to the extent that the
20 WSMA possesses such records.

21 REQUEST FOR PRODUCTION NO. 5:

22 The WSMA objects to this request because it purports to require the WSMA to produce
23 documents that are covered by the attorney-client privilege, the work product doctrine, and other
24 applicable privilege or protection.

25 The request is also overly broad, unduly burdensome, and likely meant to harass.

1 REQUEST FOR PRODUCTION NO. 6:

2 The WSMA does not have some of the requested documents in its possession, custody, or
3 control as that would be a violation of anti-trust law. In addition, the request is overly broad,
4 vague, and unduly burdensome. The request also seeks irrelevant material not reasonably
5 calculated to lead to the discovery of admissible evidence.

6 The WSMA also disputes Premera's characterization of the Commissioner's Fourth Order

7 REQUEST FOR PRODUCTION NO. 7:

8 The WSMA does not have some of the requested documents in its possession, custody, or
9 control as that would be a violation of anti-trust law. In addition, the request is overly broad,
10 vague, and unduly burdensome. The request also seeks irrelevant material not reasonably
11 calculated to lead to the discovery of admissible evidence.

12 REQUEST FOR PRODUCTION NO. 8:

13 The WSMA does not have some of the requested documents in its possession, custody, or
14 control as that would be a violation of anti-trust law. In addition, the request is overly broad,
15 vague, and unduly burdensome. The request also seeks irrelevant material not reasonably
16 calculated to lead to the discovery of admissible evidence.

17 REQUEST FOR PRODUCTION NO. 9:

18 The WSMA objects to this request because it purports to require the WSMA to produce
19 documents that are covered by the attorney-client privilege, the work product doctrine, and other
20 applicable privilege or protection.

21 The request is also overly broad, unduly burdensome, and likely meant to harass.

22 In addition, the WSMA does not have some of the requested documents in its possession,
23 custody, or control as that would be a violation of anti-trust law.

1 REQUEST FOR PRODUCTION NO. 10:

2 The WSMA objects to this request because it purports to require the WSMA to produce
3 documents that are covered by the attorney-client privilege, the work product doctrine, and other
4 applicable privilege or protection.

5 The request is also overly broad, unduly burdensome, and likely meant to harass.

6 In addition, the WSMA does not have some of the requested documents in its possession,
7 custody, or control as that would be a violation of anti-trust law.

8 Filed this 5th day of November 2003.

9 COOPERSMITH HEALTH LAW GROUP, P.S.

10 By _____
11 Jeff Coopersmith, WSBA #20913
12 Attorney for Intervener WSMA
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